UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

23-原-010

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Case No. 23-CR-[Title 18, U.S.C. §§ 2252A(a)(5)(B), and (b)(2).]

JOSEPH M. THOMAS,

Defendant.

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. On or about November 16, 2021, in the State and Eastern District of Wisconsin and elsewhere,

JOSEPH M. THOMAS

knowingly possessed matter that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a minor who had not attained the age of 12 years, and which had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported by a means of interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included a file identified by the following partial file name:

| Partial File Name | Description |
|-------------------|---|
| 46B0A21 | This file is a still image of a pre-pubescent girl, |
| | who appears to be approximately 3-4 years old, |
| | whose buttocks are exposed. There is a nude adult |
| | male crouched behind the girl with his erect penis |
| | exposed and the man is holding the girl. |

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

NOTICE OF FORFEITURE

Upon conviction of the offense set forth in the indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offense.

FOREPERSO

Dated:

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GREGORY J. HAANSTA United States Attorney